

1 E. MARTIN ESTRADA  
United States Attorney  
2 CAMERON L. SCHROEDER  
Assistant United States Attorney  
3 Chief, National Security Division  
KATHRYNNE N. SEIDEN (Cal. Bar No. 310902)  
4 SOLOMON KIM (Cal. Bar No. 311466)  
Assistant United States Attorneys  
5 Terrorism and Export Crimes Section  
1500 United States Courthouse  
6 312 North Spring Street  
Los Angeles, California 90012  
7 Telephone: (213) 894-0631/2450  
Facsimile: (213) 894-2927  
8 E-mail: kathrynne.seiden@usdoj.gov  
solomon.kim@usdoj.gov  
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Attorneys for Plaintiff  
10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 ROBERT RUNDO et al.,

17 Defendants.  
18

No. 2:18-759-CJC

GOVERNMENT'S UNOPPOSED EX PARTE  
APPLICATION FOR LEAVE TO FILE  
OVERSIZED BRIEF; DECLARATION OF  
KATHRYNNE N. SEIDEN

19 Plaintiff United States of America, by and through its counsel  
20 of record, the United States Attorney for the Central District of  
21 California and Assistant United States Attorneys Kathrynne N. Seiden  
22 and Solomon Kim, hereby applies ex parte for leave to file an  
23 oversized brief. This ex parte application is based upon the  
24 attached declaration of Kathrynne N. Seiden.

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1 Counsel for defendants do not object to this ex parte  
2 application or to the government's filing of an oversized brief.

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4 Dated: February 5, 2024

Respectfully submitted,

5 E. MARTIN ESTRADA  
6 United States Attorney

7 CAMERON L. SCHROEDER  
8 Assistant United States Attorney  
Chief, National Security Division

9 /s/ Kathrynne N. Seiden

10 KATHRYNNE N. SEIDEN

11 SOLOMON D. KIM

Assistant United States Attorneys

12 Attorneys for Plaintiff  
13 UNITED STATES OF AMERICA  
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**DECLARATION OF KATHRYNNE N. SEIDEN**

I, Kathrynne N. Seiden, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am one of the attorneys assigned to represent the government in this case.

2. The government requests permission to file an oversized brief in response to Defendants' Motion to Dismiss for Selective Prosecution. Given the nature of the motion, the government submits that an oversized brief is necessary to present the Court with a sufficient factual record and to respond in full to defendants' arguments.

3. I have conferred with counsel for defendants regarding this request. Counsel do not oppose the filing of an oversized brief.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on February 5, 2024.

/s/ Kathrynne N. Seiden  
KATHRYNNE N. SEIDEN